

Federal Communications Commission Washington, D.C. 20554 FCC 303-S	Approved by OMB 3060-0110 (July 2004) FOR FCC USE ONLY
APPLICATION FOR RENEWAL OF BROADCAST STATION LICENSE Read INSTRUCTIONS Before Filling Out Form	FOR COMMISSION USE ONLY FILE NO. - 20060810ANL

Section I - General Information- TO BE COMPLETED BY ALL APPLICANTS

1.	Legal Name of the Applicant KGO TELEVISION, INC.						
	Mailing Address 77 WEST 66TH STREET, 16TH FLR ATTN: JOHN W. ZUCKER, ESQ.						
	City NEW YORK	State or Country (if foreign address) NY	ZIP Code 10023 - 6298				
	Telephone Number (include area code) 2124567777		E-Mail Address (if available)				
	FCC Registration Number: 0003471331	Call Sign KGO-TV	Facility Identifier 34470				
2.	Contact Representative (if other than Applicant) JOHN W. ZUCKER, ESQ.		Firm or Company Name KGO TELEVISION, INC.				
	Mailing Address 77 WEST 66TH STREET, 16TH FLR						
	City NEW YORK	State or Country (if foreign address) NY	Zip Code 10023 - 6298				
	Telephone Number (include area code) 2124567387		E-Mail Address (if available)				
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee <input type="radio"/> Other <input type="radio"/> N/A (Fee Required)						
4.	Purpose of Application <input checked="" type="radio"/> Renewal of license <input type="radio"/> Amendment to pending renewal application If an amendment, submit as an exhibit a listing by Section and Item Number the portions of the [Exhibit 1] pending application that are being revised.						
5.	Facility Information: <input checked="" type="radio"/> Commercial <input type="radio"/> Noncommercial Educational						
6.	Service and Community of License a. <input type="radio"/> AM <input type="radio"/> FM <input checked="" type="radio"/> TV <input type="radio"/> FM Translator <input type="radio"/> LPFM <input type="radio"/> TV Translator <input type="radio"/> Low Power TV <input type="radio"/> Class A TV <table border="1" data-bbox="203 1711 1023 1795"> <tr> <td colspan="2">Community of License /Area to be Served</td> </tr> <tr> <td>City: SAN FRANCISCO</td> <td>State : CA</td> </tr> </table> b. Does this application include one or more FM translator station(s), or TV translator station(s), LPTV station(s), in addition to the station listed in Section I question 1? (The callsign(s) of any associated FM translators, TV translators or LPTVs will be requested in Section V). <input type="radio"/> Yes <input checked="" type="radio"/> No			Community of License /Area to be Served		City: SAN FRANCISCO	State : CA
Community of License /Area to be Served							
City: SAN FRANCISCO	State : CA						

- | | | |
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| 7. | Other Authorizations. List call signs, facility identifiers and location(s) of any FM booster or TV booster station(s) for which renewal of license is also requested. | [Exhibit 2] |
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Section II - Legal - TO BE COMPLETED BY ALL APPLICANTS

1.	Certification. Licensee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Licensee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application, instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Character Issues. Licensee certifies that the neither the licensee nor any party to the application has or has had any interest in, or connection with:	
a.	any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 3]
b.	any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 4]
3.	Adverse Findings. Licensee certifies that, with respect to the licensee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any laws related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 5]
4.	FCC Violations during the Preceding License Term. Licensee certifies that, with respect to the station(s) for which renewal is requested, there have been no violations by the licensee of the Communications Act of 1934, as amended, or the rules or regulations of the Commission during the preceding license term. If No, the licensee must submit an explanatory exhibit providing complete descriptions of all violations.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]
5.	Alien Ownership and Control. Licensee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]
6.	Anti-Drug Abuse Act Certification. Licensee certifies that neither licensee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing JOHN W. ZUCKER	Typed or Printed Title of Person Signing ASSISTANT SECRETARY
Signature	Date 8/10/2006

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. If you do not provide the information requested on this report, the report may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authority. We have estimated that each response to this collection of information will average 3 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERF, Paperwork Reduction Project (3060-0110), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to Leslie.Smith@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0110.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(c)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

SECTION IV - TO BE COMPLETED BY TV AND CLASS A LICENSEES ONLY

1.	Biennial Ownership Report: Licensee certifies that the station's Biennial Ownership Report (FCC Form 323 or 323-E) has been filed with the Commission as required by 47 C.F.R. Section 73.3615.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 14]
2.	EEO Program: Licensee certifies that: a. The station's Broadcast EEO Program Report (FCC Form 396) has been filed with the Commission, as required by 47 C.F.R. Section 73.2080(f)(1). Specify FCC Form 396 File Number : B396 20060810ANK b. The station has posted its most recent Broadcast EEO Public File Report on the station's website, as required by 47 C.F.R. Section 73.2080(c)(6).	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 15] <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 16]
3.	Local Public File. Licensee certifies that the documentation, required by 47 C.F.R. Section 73.3526 or 73.3527, as applicable, has been placed in the station's public inspection file at the appropriate times.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 17]
4.	Violent Programming. Licensee certifies that no written comments or suggestions have been received from the public that comment on its station's programming and characterize that programming as constituting violent programming. If No, submit as an Exhibit a summary of those written comments and suggestions received from the public.	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 18]
5.	Children's Programming Commercial Limitations For the period of time covered by this application, the licensee certifies that it has complied with the limits on commercial matter as set forth in 47 C.F.R. Section 73.670. (The limits are no more than 12 minutes of commercial matter per hour during children's programming on weekdays, and no more than 10.5 minutes of commercial matter per hour during children's programming on weekends. The limits also apply pro rata to children's programs which are 5 minutes or more and which are not part of a longer block of children's programming.) If No, submit as an Exhibit a statement of explanation a list of each segment of programming 5 minutes or more in duration designed for children 12 years and under and broadcast during the license period which contained commercial matter in excess of the limits. For each programming segment so listed, indicate the length of the segment, the amount of commercial	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 19]

	matter contained therein, and an explanation of why the limits were exceeded.	
6.	For the period of time covered by this application, the applicant certifies that it has filed with the Commission, and incorporates by reference , the Children's Television Programming Reports (FCC Form 398) as described in 47 C.F.R. Section 73.3526. If No, submit as an Exhibit a statment of explanation.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 20]
7.	For the period of time covered by this application, the applicant certifies that the average number of hours of CORE programming per week broadcast by the station totalled 3 hours or more (averaged over a six-month period).	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 21]
8.	The licensee certifies that it identifies each CORE Program aired at the beginning of the airing of each program as required by 47 C.F.R. Section 73.673. If No, submit as an Exhibit a statment of explanation.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 22]
9.	The licensee certifies that it provides information identifying each CORE Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. Section 73.673. If No, submit as an Exhibit a statement of explanation.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 23]
10.	The licensee certifies that it publicizes the existence and location of the station's Children's Television Programming Reports (FCC Form 398) as required by 47 C.F.R. Section 73.3526(e) (11)(iii). If No, submit as an Exhibit a statement of explanation , including the specific steps the applicant intends to implement to ensure compliance in the future.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 24]
11.	The licensee may include as an exhibit any other comments or information it wants the Commision to consider in evaluating compliance with the Children's Television Act. This may include information on any other non-core educational and informational programming that the applicant aired or plans to air, or any existing or proposed non-broadcast efforts that will enhance the educational and informational value of such programming to children. See 47 C.F.R. Section 73.671, NOTE 2.	[Exhibit 25]
12.	Continued Class A Eligibility. Licensee certifies that its station does, and will continue to, broadcast: (a) a minimum of 18 hours per day; and (b) an average of at least 3 hours per week of programming each quarter produced within the market area served by the station, a group of commonly controlled low power or Class A stations whose predicted Grade B contours are contiguous.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 26]
13.	Discontinued Operations. Licensee certifies that during the preceding license term, the station has not been silent for any consecutive 12-month period.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 27]
14.	Silent Station. Licensee certifies that the station is currently on the air broadcasting programming intended to be received by the public.	<input checked="" type="radio"/> Yes <input type="radio"/> No
15.	Environmental Effects. Licensee certifies that the specified facility complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments. By checking "Yes" above, the licensee also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 28]

16. Local TV Ownership Waiver. Has the licensee been granted a "failing" or "marginal" station waiver of 47 C.F.R. Section 73.3555(b)?	<input type="radio"/> Yes <input checked="" type="radio"/> No
If Yes, submit as an Exhibit a specific factual showing of the program-related benefits that have accrued to the public as a result of that waiver.	See Explanation in [Exhibit 29]

Exhibits

Exhibit 3

Description: CHARACTER ISSUES

Attachment 3

Description
Character Issues

Exhibit 5

Description: ADVERSE FINDINGS

Attachment 5

Description
Adverse Findings

Exhibit 18

Description: VIOLENT PROGRAMMING

Attachment 18

Description
Violent Programming Summary

Exhibit 28

Description: ENVIRONMENTAL EFFECTS

Attachment 28

Description
RFR
Study

CHARACTER ISSUES

Over the years, the applicant to this application and its predecessor companies and interest holders ("Applicant") have filed many applications with the Federal Communications Commission ("Commission") in connection with their owned stations or previously owned stations and in connection with their network operations. Some of these applications have been dismissed. A full record of the licensee's application activity will be found in the respective license records maintained by the Commission for the individual stations.

Applicant's response to this question does not specifically attempt to comprehend all past applications of licenses for broadcast auxiliary or various non-broadcast stations (private radio, etc.). Some applications and/or authorizations for such facilities have, indeed, been routinely dismissed or voluntarily terminated over the years. Furthermore, Applicant does not interpret the Question, to the extent it seeks information regarding character issues including dismissed and/or denied applications, as comprehending applications for auxiliary facilities or non-broadcast facilities which may have been acted upon in a comparative or lottery context involving one or more competing applications.

Applicant affirms that no application to the Commission by Applicant, or by any party to the pending application has been denied or dismissed with prejudice by the Commission on character grounds. There are no pending applications involving applicant or its broadcast subsidiaries or associated companies in which character issues have been raised, nor are we aware of any pending character issues with respect to any party to the application.

In an overabundance of caution, Applicant notes that there is an application for review pending against the application to assign the license of station KDIS-FM (formerly KYFX(FM)) Little Rock, Arkansas, from Nameloc, Inc. to ABC, Inc. While Applicant does not believe that the application for review raises any character issues, in the submission, Nameloc, Inc. repeats allegations previously denied by the Media Bureau that it claims raise character issues against ABC, Inc. Applicants vigorously have opposed the application for review and have demonstrated that the allegations are meritless. Moreover, even if the allegations were true (which they are not), they do not raise character issues. See FCC File No. BALH20030319AEZ. The license assignment application was granted by the Media Bureau on May 30, 2003 and the transaction was consummated on July 10, 2003.

ADVERSE FINDINGS

The only adverse finding or adverse final action that may be reportable with respect to The Walt Disney Company, Disney Enterprises, Inc., ABC, Inc, any of its broadcast subsidiaries (one of which is the subject of this application), or any of their respective officers or directors is as follows: Children's Broadcasting Corp. v. The Walt Disney Company and ABC Radio Networks (Civil Action No. 96-CV-907 DDA1, FLN, D. Minn.). On May 10, 2002, a Minneapolis jury returned a verdict on the only claims remaining in the lawsuit: (1) breach of contract (failure to use reasonable efforts to sell advertising), and (2) breach of contract (confidentiality)/misuse of a list of potential advertisers. Plaintiff Children's Broadcasting Companies' ("CBC") fraud, breach of fiduciary duty and negligent misrepresentation claims were previously dismissed. In August 2002, the trial judge entered judgment on the jury verdict and denied the parties' post-trial motions. The Walt Disney Company and ABC Radio Networks filed an appeal, and CBC filed a cross-appeal. On January 24, 2004, the Eighth Circuit Court of Appeals issued a decision that affirmed the district court decision and rejected the parties' grounds for appeal. Defendants have paid the judgment.

The verdict does not, in our view, constitute an "adverse finding" in a proceeding "brought under the provisions of any law relating to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination." However, the phrase "unfair competition," which is sometimes used to denote the type of anticompetitive conduct at which antitrust laws are aimed, is also sometimes used more broadly to refer to a wide variety of business torts (including the misappropriation of trade secrets) that protect very different kinds of

interests. While we think it clear that the Commission did not use the phrase “unfair competition” in this second, broader sense, we are reporting the jury verdict in what may be an excess of caution.

The list of categories specified in the application form stems from the FCC’s Character Policy, 102 F.C.C.2d 1179, on recon., 1 FCC Rcd 421 (1986), as modified, 5 FCC Rcd 3252 (1990), on recon., 6 FCC Rcd 3448 (1991), further recon., 7 FCC Rcd 6564 (1992). Since its 1986 order, the Commission has limited its inquiries into litigation for purposes of character evaluation, disclaiming a general interest in whether an applicant or licensee has violated any law whatever governing business conduct. On the other hand, “antitrust and anticompetitive activity in broadcasting have occupied a unique position in the Commission’s regulatory scheme,” and hence violations of “anticompetitive or antitrust laws” have “a potential bearing on an applicant’s proclivity to comply with the Commission’s rules and policies.” 102 F.C.C.2d at 1201-02. It is clear therefore that the references to “unfair competition” in the Commission’s application forms are intended to be limited to laws specifically designed to prohibit anticompetitive conduct of the kind encompassed by antitrust laws. Preventing the misappropriation of trade secrets has never occupied a “unique position in the Commission’s regulatory scheme.” The jury verdict does not constitute an adverse finding within the meaning of the Commission’s disclosure requirement. The verdict does not reflect adversely on the character of The Walt Disney Company or ABC.

LETTERS OR E-MAIL CORRESPONDENCE RECEIVED BY KGO-TV THAT MAY BE CONSIDERED TO OFFER COMMENTARY ON THE STATION'S PROGRAMMING REGARDING POSSIBLE VIOLENT CONTENT ARE SUMMARIZED AS FOLLOWS:

07/14/03 – E-MAIL: VIEWER COMMENT ON GRAPHIC NATURE OF BREAKING NEWS VIDEO OF CAR ACCIDENT

09/06/03 – E-MAIL: VIEWER COMMENT ON VIOLENT NATURE OF COMMERCIAL AIRED DURING FOOTBALL GAME.

10/31/03 – E-MAIL: VIEWER COMMENT ON VIOLENT NATURE OF NEWS STORY COVERING TORTURE OF POLITICAL PRISONERS

10/31/03; 11/02/03 – E-MAILS: TWO VIEWERS COMMENT SEPARATELY ON VIOLENT NATURE OF NEWS STORY COVERING THE SHOOTING OF AN ATTORNEY OUTSIDE OF A COURTHOUSE.

11/05/03 – E-MAIL: VIEWER COMMENT ON COMMERCIAL FOR UPCOMING SHOW THAT TELLS THE STORY OF THE VIOLENT TREATMENT OF A WOMAN.

12/13/03; 12/13/03; 12/17/03 – E-MAILS: THREE VIEWERS COMMENT ON NEWS BREAK COVERAGE OF A CHILD MURDER DURING A GENERAL AUDIENCE ANIMATED SPECIAL.

12/15/03 – E-MAIL: VIEWER CONDEMNS SHOWING OF VIOLENCE THREE TIMES DURING A FOOTBALL GAME, NOT THE FOOTBALL GAME ITSELF, AND WITHOUT DIRECT REFERENCE TO WHAT THE VIOLENCE WAS BECAUSE FOOTBALL SHOULD BE A FAMILY VIEWING EXPERIENCE.

01/04/04 – E-MAIL: AFTER CONDEMNING STATION FOR PERMITTING FOOTBALL OVERRUN TO PREEMPT REGULAR PROGRAMMING VIEWER OFFERS NON-SPECIFIC CONDEMNATION TO STATION FOR FEATURING VIOLENT PROGRAMMING SANDWICHED BETWEEN NON-STOP COMMERCIALS.

02/29/04 – E-MAIL: VIEWER CRITICIZES A NATIONALLY SYNDICATED MOVIE REVIEW PROGRAM FOR SHOWING MOVIE CLIPS SHE CONSIDERED VIOLENT DURING A TIME HER CHILD WAS ABLE TO VIEW THE SHOW.

04/29/04 – E-MAIL: VIEWER CRITICIZES COMMERCIAL FOR PROMOTING RAGE AND REQUESTS AD BE PULLED.

05/17/04 – E-MAIL: VIEWER COMPLAINS THAT NEWS IN GENERAL IS FULL OF ENOUGH VIOLENCE THAT IT IS UNNECESSARY TO FEATURE A STORY ABOUT THE SHOOTING OF A MOUNTAIN LION.

05/12/04 – E-MAIL: VIEWER COMMENTS ON THE EXTENSIVE NEWS COVERAGE OF THE VIOLENCE OF WAR ESPECIALLY A BEHEADING.

06/05/04 – E-MAIL: VIEWER COMMENTS GENERALLY ON THE VIOLENCE THAT HAS BECOME PART OF TODAY’S “ENTERTAINMENT.”

08/04/04 – LETTER: VIEWER EXPRESSES DISGUST WITH NETWORK VIDEO PROGRAM FOR INCLUDING SCENES WITH CHILDREN IN WHAT VIEWER DEEMS POTENTIALLY INJURIOUS SITUATIONS THAT ELICITS LAUGHTER FROM VIEWERS.

08/09/04 – E-MAIL: VIEWER EXPRESSES DISGUST WITH NETWORK FOR SHOWING FEATURE FILM THAT INCLUDES A SCENE OF A LAW ENFORCEMENT OFFICER BEING SHOT.

11/11/04 – E-MAIL: VIEWER THANKS STATION FOR AIRING SAVING PRIVATE RYAN IN ITS ENTIRETY AND SHOWING VIOLENCE AND HORROR OF WAR.

03/17/05 – E-MAIL: VIEWER CRITICIZES COMMERCIAL FEATURING “IN UTERO [SIC] FETUS” THREATENING VIOLENCE AGAINST MOTHER FOR EATING THE WRONG SANDWICH

08/12/05; 08/13/05; 08/14/05 – E-MAILS: THREE VIEWER COMPLAINTS REGARDING NEWS ARTICLE SHOWING DUCKS BEING RUN OVER AT LOCAL CAR WASH.

02/05/06; 02/09/06 – E-MAILS: TWO VIEWERS COMPLAIN ABOUT THE VIOLENT FOOTAGE CONTAINED IN AN INVESTIGATIVE LOCAL NEWS REPORT ON OPEN FIELD COURSING – A SO-CALLED SPORT WHERE DOGS HUNT RABBITS IN AN OPEN FIELD; PRIOR TO THE REPORT VIEWERS WERE GIVEN NOTICE OF GRAPHIC CONTENT.

**KGO Television, Inc.
San Francisco, California**

Evaluation of Radiofrequency Fields

**KGO-TV and KGO-DT
Transmitter Site**

**Sutro Tower
San Francisco, California**

July 31, 2006

**KGO Television, Inc.
Licensee of KGO-TV and KGO-DT
San Francisco, California**

**Evaluation of Radio Frequency Fields
Sutro Tower
San Francisco, California**

Engineering Statement

I am a consulting engineer, employed by the Carl T. Jones Corporation with offices in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a registered professional engineer in the Commonwealth of Pennsylvania with registration number PE-027589E.

Introduction

KGO Television, Inc. (KGO-TV) has authorized this office to assess the compliance of its transmitting facilities at Sutro Tower with regard to human exposure to radiofrequency energy.

KGO-TV operates on channel 7 under the terms of its license, which are contained in FCC File Number BLCT-2339. KGO-DT operates on channel 24 under the terms of its license which are contained in FCC File Number BLC DT-19981216KF. Both stations operate from antennas that are located on the Sutro Tower at 1 La Avanzada Street, San Francisco, California.

Periodically, Sutro Tower Inc. retains the services of consulting engineers to evaluate radiofrequency conditions at the Sutro Tower site. This is done to assure compliance with the Commission's Rules regarding human exposure to radiofrequency energy, and the information gained through this assessment is also used to update the RF safety practices that the Sutro Tower management has developed.

As a tenant of the Sutro Tower, KGO-TV has agreed to operate in compliance with these guidelines and RF safety practices.

The most recent evaluation of the radiofrequency environment at Sutro Tower was performed by the firm of Hammett and Edison, and the engineering statement associated with this evaluation was signed on July 11, 2006 by Mark D. Neumann, P. E.

The evaluation involved measurement of radiofrequency fields on the tower and at ground level. The Report states that approximately 200 measurements were made at ground level. These measurements were made on June 30, 2006, according to the Hammett and Edison report. Hammett and Edison found the maximum exposure level at any point accessible by the general public did not exceed 8.0% of the standard for uncontrolled areas

Site Description

The Sutro Tower site is completely surrounded by a fence which precludes public access. The site is manned at all times, every day of the year, 24 hours each day. Access to the tower itself is controlled by electrical lock-out switches which preclude any access to the tower elevators without first obtaining a key from the Sutro Tower management. Only persons who have been properly instructed in RF safety procedures are permitted on the tower or on those locations on the site when elevated levels of radiofrequency energy are expected at ground level.

The Hammett and Edison study has concluded that during operation on main antennas, the fields at ground level do not exceed the limits in the Commission's Rules for Uncontrolled Areas. Some locations inside the perimeter fence exhibit elevated levels of radiofrequency fields when certain combinations of auxiliary antennas are operating, but no location at ground level was found to exceed the occupational maximum permissible exposure limit with any combination of antennas within the perimeter fence in the recent evaluation.

Safety Practices

The Sutro Tower RF safety practices are followed within the fenced area and on the tower itself. The locations on the Sutro Tower where occupational levels are exceeded are defined in the Sutro Tower RF Safety Practices documents that are supplied to each tenant. This document also contains safety requirements to instruct workers and others who must work aloft about basic physical safety measures as well as measures that are taken to assure workers that they will not inadvertently be subjected to excessive exposure to radiofrequency energy.

The tenants who operate transmitting facilities have agreed to reduce power, operate from auxiliary antennas or cease operation when access is required by workers aloft. As a tenant, KGO-TV is required to follow the RF safety practices that have been developed, and supports efforts by Sutro Tower Inc. to revise the safety practices as required when new operations begin or older operations are modified.

Conclusions

The Hammett and Edison evaluation concluded that the Sutro Tower Communications Site fully complies with applicable FCC Rules regarding human exposure to radiofrequency energy.

Based on the latest evaluation of the RF environment at Sutro Tower, and the commitment of KGO-TV to strictly follow the RF Safety Practices that have been developed by Sutro Tower Inc., it can be concluded that the operation of KGO-TV and KGO-DT meet the Commission's requirements regarding human exposure to radiofrequency energy, as contained in Sections 1.1307(b) and 1.1310 of the Commission's Rules.

Certification

I certify that, on behalf of KGO Television, Inc. I have prepared the information contained in this Engineering Statement, and that after such preparation, I have examined it and found it to be accurate and true to the best of my knowledge and belief.



Signed: _____
Alfred E. Resnick, P. E.

Dated: July 31, 2006

Sutro Tower, Inc • San Francisco, California

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Sutro Tower, Inc., to evaluate the existing radio frequency (RF) exposure conditions at Sutro Tower in San Francisco, California, in anticipation of license renewal filings by the tenant TV stations, who need to certify compliance with appropriate guidelines for limiting radio frequency exposure.

Electromagnetic Field Exposure Standard

The U.S. Congress requires that the Federal Communications Commission (“FCC”) evaluate its actions for possible significant impact on the environment. In Docket 93-62, effective October 15, 1997, the FCC adopted the human exposure limits for field strength and power density recommended in Report No. 86, “Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields,” published in 1986 by the Congressionally chartered National Council on Radiation Protection and Measurements (“NCRP”). Separate limits apply for occupational and public exposure conditions, with the latter limits generally five times more restrictive. The more recent Institute of Electrical and Electronics Engineers (“IEEE”) Standard C95.1-1999, “Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz,” includes nearly identical exposure limits. A summary of the FCC’s exposure limits is shown in Figure 1. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

The guidelines allow higher exposures for short time periods. Exposures can be averaged over a six-minute period, allowing, for example, a two-minute exposure to fields three times the limit if the remainder of the six-minute period does not include any significant exposure.

Restrictions on access to strong fields may be achieved in different manners for casual public exposure than for occupational exposure. Persons who are authorized to be in a site area can be educated to follow procedures that will limit time-averaged exposures to levels not exceeding the guidelines.

Site Description

The Sutro Tower Communications Site is entirely encompassed by a chain-link fence, with access into the area controlled by a locked gate. Figure 1 shows a plan view of the site, while Figures 2 and 3 provide a summary of broadcast information and a tower elevation.

Since any individuals requiring entry to the communications site must first be authorized by one of the site users to obtain access, and since the gate is manned 24 hours a day seven days a week, the site is a



Sutro Tower, Inc • San Francisco, California

controlled environment. In addition, on-tower access requires an elevator key, and lockouts are utilized to prevent access to areas that may exceed the occupational limit on the tower.

Measurements at Sutro Tower

The site was visited by the undersigned engineer on June 30, 2006. Measurements were made at over 200 points surrounding the site and throughout the site itself. The measurement equipment used was a Wandel & Goltermann Type EMR-300 Radiation Meter with Type 18 and Type25 Isotropic Field Probes (Serial Nos. E-0034 and E-0001 respectively). Both meter and probes were under current calibration by manufacturer. The Type 25 probe is frequency-shaped to reflect the occupational exposure limits detailed in the FCC standard, allowing the meter to measure correctly the total exposure levels from the various emitters at the site. Measurements were also made on the fifth and sixth levels of the tower and on the roof of the transmitter building. All broadcast facilities were under normal main antenna operation throughout the duration of the measurements with the exception of FM Station KSOL, which was operating from a single-bay, temporary emergency antenna mounted about 19 meters above the licensed main antenna, reportedly at about 3.2 kW effective radiated power.

Ground Level Measurements

During operation on the main antennas, no ground level areas were found that exceeded the public exposure limit. The maximum ambient RF level in any publicly accessible area measured 8.0% of the FCC public exposure limit. Within the Sutro Tower compound, the maximum ambient RF level at ground level measured 1.3% of the FCC occupational exposure limit, with a maximum of 1.8% on the roof of the transmitter building.

On-Tower Measurements

Measurements were made on the fifth and sixth levels of the tower. The maximum ambient RF levels were found to be less than the occupational exposure limit within 20 feet of the elevator platform on the west side of the tower on both levels. Beyond 20 feet east of the elevator platform on the fifth and sixth levels of the tower, fields were found to exceed the FCC occupational exposure limit.

Auxiliary Antenna Operation

Thirteen stations broadcasting from Sutro Tower also operate auxiliary antennas from the second level of the tower. Detailed auxiliary antenna measurements were last made in September 26, 1993. Since that date a single additional auxiliary antenna has been added on Level 2, for KCNS, NTSC Channel 38; measurements have not been conducted on that antenna.



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Mitigation Measures

The Sutro Tower site is entirely fenced to preclude public access; therefore, no further mitigation measures are required for compliance with the FCC's guidelines limiting public exposures under normal main antenna operation. Under auxiliary antenna operation, a table of relative contributions from each antenna is utilized, along with real-time measurements, if necessary, to ensure that no combination of antennas is energized such that fields in publicly accessible areas would exceed the FCC public exposure limit. The KCNS antenna has not yet been evaluated for inclusion in the auxiliary antenna table; however, it is reported that measurements will be utilized if operation of the KCNS auxiliary antenna is required in order to evaluate RF exposure levels from the antenna and to ensure that levels in accessible areas remain below the FCC public exposure limit.

No ground level areas within the broadcast site have been found to exceed the FCC occupational exposure limit under any operational condition. Mitigation measures are in place to ensure that access to on-tower areas that exceed the occupational exposure limit is restricted with the site under normal broadcast operations and broadcasters at the site are reported to have agreed to abide by these directives. Further restrictions are in place limiting access to the tower above ground level and to the transmitter building rooftop when any auxiliary antenna is energized. Therefore, no further recommendations are required for compliance with the FCC's guidelines limiting occupational exposures.

Conclusion

Based upon our observations and measurements, and upon information provided by Sutro Tower, Inc., the Sutro Tower Communications Site complies with applicable FCC Rules regarding human exposure to RF radiation.

List of Figures

In carrying out these engineering studies, the following attached figures were prepared under my direct supervision:

1. Site map
2. Summary of broadcast station operating parameters
3. Tower elevation drawing.



Sutro Tower, Inc • San Francisco, California

Authorship

The undersigned author of this statement is a qualified Professional Engineer, holding California Registration No. E-16747, which expires on September 30, 2006. This work has been carried out by him or under his direction, and all statements are true and correct of his own knowledge except, where noted, when data has been supplied by others, which data he believes to be correct.

July 11, 2006



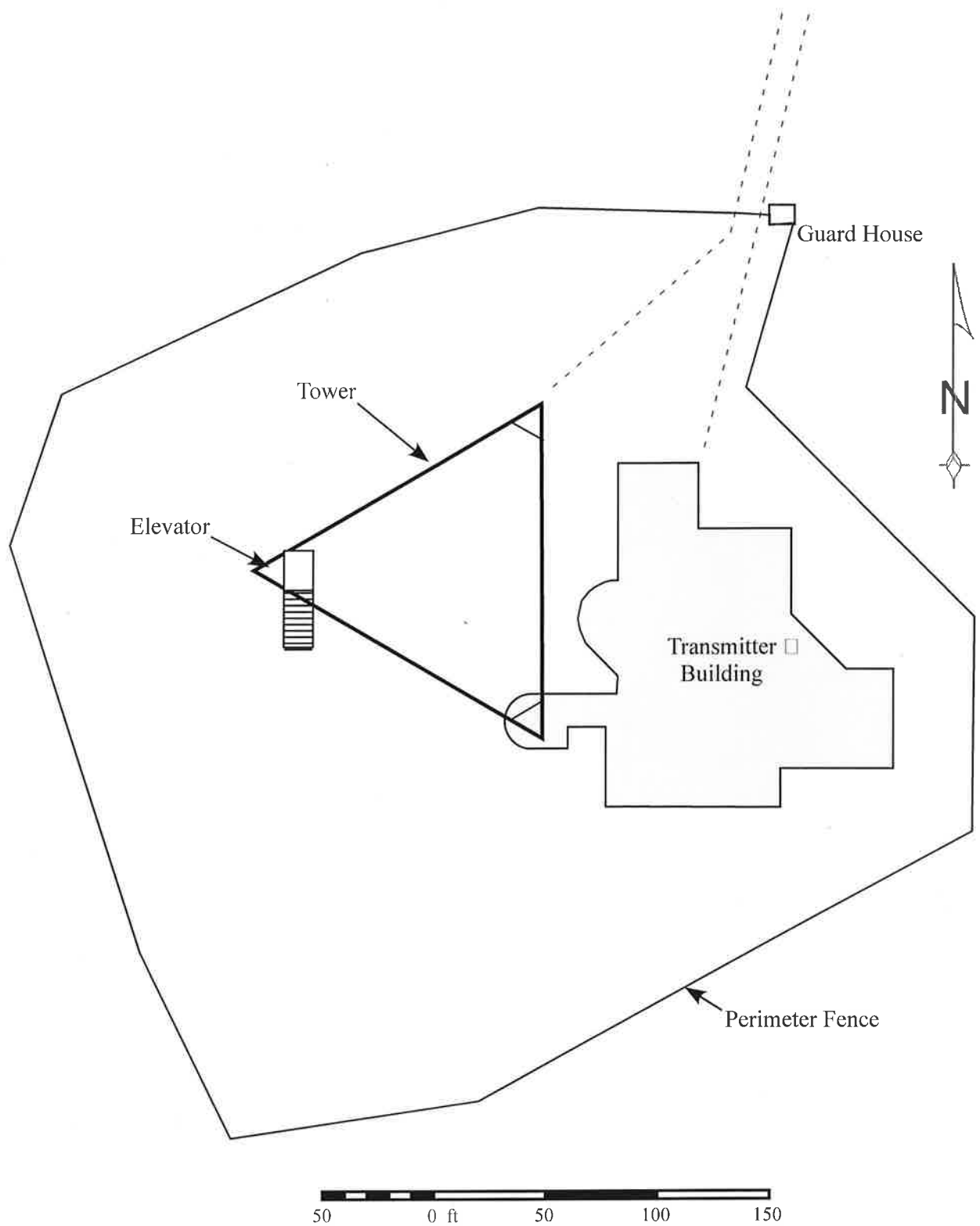
Mark D. Neumann, P.E.



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

Sutro Tower, Inc. • San Francisco, California

Site Plan



Sutro Tower, Inc. • San Francisco, California

Summary of Broadcast Facilities

TV Channel	Call Sign	Effective Antenna Height AMSL*	Effective Radiated Power†
N02	KTVU	510 m	100 kW
N04	KRON-TV	545	100
N05	KPIX-TV	538	100
N07	KGO-TV	540	316
N09	KQED	541	316
D19	KBWB-DT	450	383
N20	KBWB	504	3470
D24	KGO-DT	468	561
D29	KPIX-DT	450	1000
D30	KQED-DT	468	777
N32	KMTP-TV	523	1320
D33	KMTP-DT (STA)	468	400
D34	KFSF-DT	450	150
N38	KCNS	476	5000
D39	KCNS-DT	459	1000
D43	KCSM-DT (STA)	459	250
N44	KBHK-TV	522	5000
D45	KBHK-DT	477	400
D56	KTVU-DT	459	1000
D57	KRON-DT	477	1000
N66	KFSF-TV	497	3470

FM Channel	Call Sign	Effective Antenna Height AMSL	Effective Radiated Power
224A	KNGY (CP)	370 m	0.51 kW
243B	KOIT-FM	511	24.0
255B	KSOL	440	6.1
279B	KKSF	492	7.2
283B	KFOG	490	7.1

* Site Elevation 254 m AMSL

† Peak visual power for NTSC stations, average power for DTV stations.

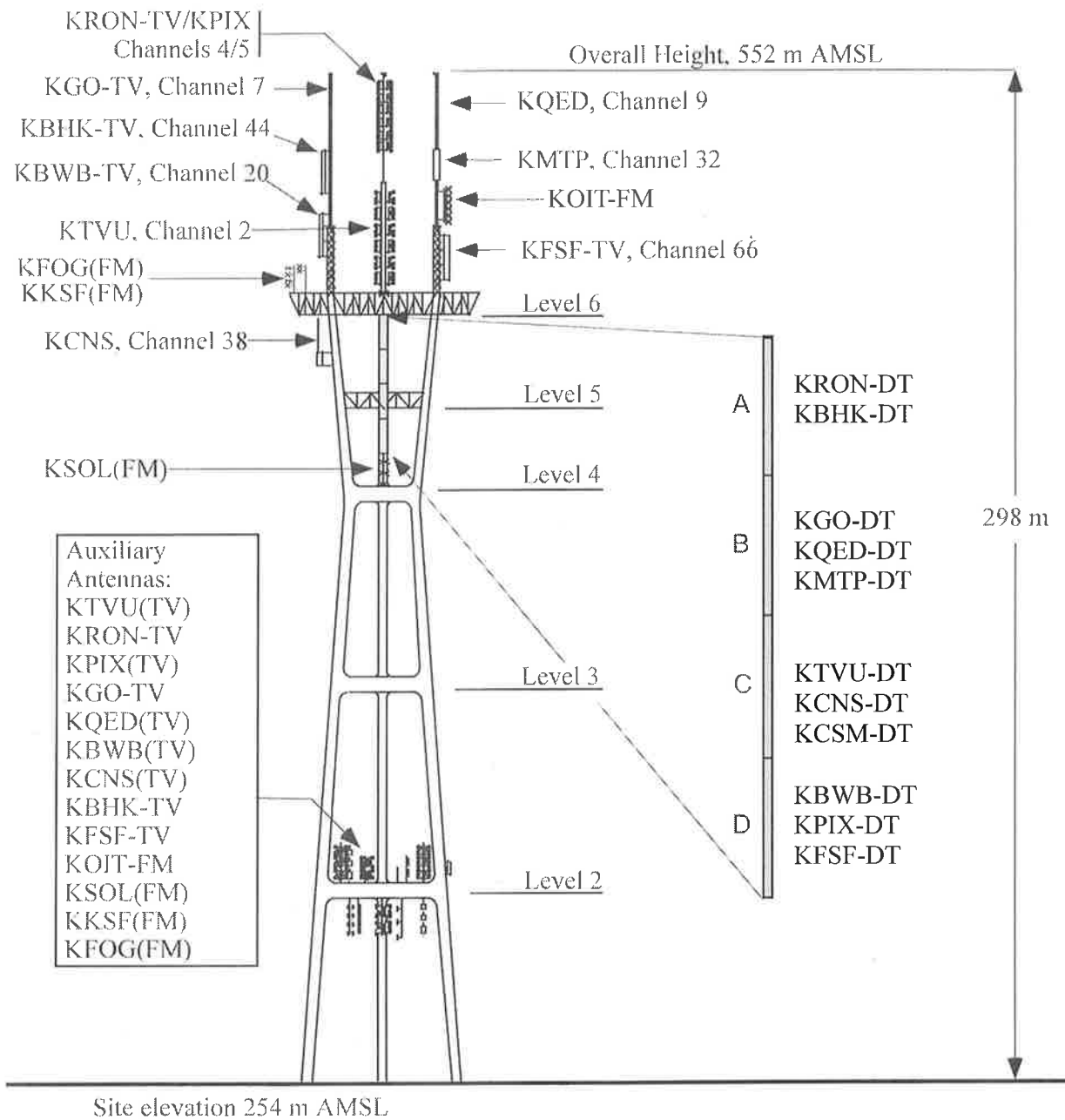


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CONSULTING ENGINEERS
SAN FRANCISCO

060706.1
Figure 2

Sutro Tower, Inc. • San Francisco, California

Antenna Locations



Geographical Coordinates 37° 45' 19" N
(NAD27) 122° 27' 06" W

(View from east)

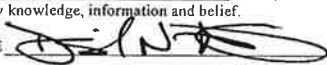
Drawing not to scale.

Painted and lighted as required by FCC.

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FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

Approved by OMB
3060-0589
Page 1 of 1

(1) LOCKBOX # 358165		SPECIAL USE ONLY	
		FCC USE ONLY	
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) KGO Television, Inc.		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$150.00	
(4) STREET ADDRESS LINE NO. 1 77 West 66th Street, 16th Floor			
(5) STREET ADDRESS LINE NO. 2			
(6) CITY New York		(7) STATE NY	(8) ZIP CODE 10023 -6298
(9) DAYTIME TELEPHONE NUMBER (include area code) 212-4567777		(10) COUNTRY CODE (if not in U.S.A.) US	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) 0003471331		(12) FCC USE ONLY	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME KGO TELEVISION, INC.			
(14) STREET ADDRESS LINE NO. 1 77 WEST 66TH STREET, 16TH FLR			
(15) STREET ADDRESS LINE NO. 2 ATTN: JOHN W. ZUCKER, ESQ.			
(16) CITY NEW YORK		(17) STATE NY	(18) ZIP CODE 10023 -6298
(19) DAYTIME TELEPHONE NUMBER (include area code) 2124567777		(20) COUNTRY CODE (if not in U.S.A.) USA	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) 0003471331		(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID KGO-TV	(24A) PAYMENT TYPE CODE MGT	(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$150.00	(27A) TOTAL FEE \$150.00	FCC USE ONLY	
(28A) FCC CODE 1 34470	(29A) FCC CODE 2 CDBS20060810ANL		
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	FCC USE ONLY	
(28B) FCC CODE 1	(29B) FCC CODE 2		
SECTION D - CERTIFICATION			
CERTIFICATION STATEMENT I, DAVID N. ARTIM , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.			
SIGNATURE 		DATE 8.10.06	
SECTION E - CREDIT CARD PAYMENT INFORMATION			
MASTERCARD _____ VISA _____ AMEX _____ DISCOVER _____			
ACCOUNT NUMBER _____		EXPIRATION DATE _____	
I hereby authorize the FCC to charge my credit card for the service(s)/authorization herein described.			
SIGNATURE _____		DATE _____	

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FCC FORM 159

FEBRUARY 2003 (REVISED)



KGO TELEVISION, INC.
900 FRONT STREET
SAN FRANCISCO, CA 94111-1450

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A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

001097

KGO Television

62-20/311

June 20, 2006 2006

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TO
THE
ORDER
OF
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Walter S. Bary

⑈001097⑈ ⑆031100209⑆

38656128⑈

Security features are included.
Details on back.

KGO TELEVISION

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DATE	DESCRIPTION	AMOUNT
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T10 P27 - 6480

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FACILITY ID 34470



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Call Sign	KGO-TV
Licensee	KGO TELEVISION INC.
City	SAN FRANCISCO
Service	TV Station
Status	Licensed
Channel	7
TV Band	VHF
Market Rank	6
Market	San Francisco-Oakland-San Jose CA
Notification ID	28861

KGO-TV

KGO TELEVISION INC.

SAN FRANCISCO

TV Station

Licensed

7

VHF

6

San Francisco-Oakland-San Jose CA

28861

Form 159 Information

Call Sign	KGO-TV
FCC Code 1	34470
FCC Code 2	CA SAN FRANCISCO
Pmt Type Code	0653
Pmt Amount	\$ 64,775.00

*****AUTO**MIXED AADC 707

KGO TELEVISION INC.
900 FRONT ST
SAN FRANCISCO, CA 94111-1427



Federal Communications Commission

FCC MB - CDBS Electronic Filing
Account number: 469947

Description: KGO-TV RENEWAL EEO AUG 2006
Application Reference Number: 20060810ANK
Successfully filed at Aug 10 2006 7:34PM

Based on the information supplied, no fee is required.

Menu

FCC MB - CDBS Electronic Filing
Application Reference Number: 20060810ANL
Successfully filed at Aug 10 2006 7:38PM

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0003471331	KGO TELEVISION, INC.	\$150.00
Total Amount Due :		\$150.00

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- Besides typing your credit card number, you are now required to type your card's security code, the last group of numbers printed on the security strip on the back of your card ([click sample](#)).
- Ensure the card holder name on the **Payment Information** screen is the same as the name specified on the credit card used for making a payment. If not, you can edit the card holder name field to match the name printed on the credit card.
- The U.S. Treasury may reject Credit Card transactions greater than \$99,999.99. This limit includes multiple transactions on the same Credit Card totaling more than this limit in a single day. For transactions greater than \$99,999.99, an alternative method of payment must be used. Payment methods can be found at <http://www.fcc.gov/fees>. Reference: Treasury Bulletin No. 2005-03 (<http://www.fms.treas.gov/tfm/vol1/05-03.html>)

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